

David Berg
Abraham David



BERG & DAVID PLLC
ATTORNEYS AT LAW

Office 718.989.1392
Fax 718.989.1394
Web www.bergpllc.com

Madeline Greenblatt
Stefanie Murphy-Boykins
Shane Wax

266 Broadway Suite 503
Brooklyn, New York 11211

August 7, 2017

Via ECF

Hon. I. Leo Glasser, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Gustavia Home, LLC v. East 93 Holdings LLC, et al.
Case No. 17-cv-4262 (ILG) (RER)

Dear Judge Glasser:

The undersigned's office, Berg & David, PLLC, has just been retained as attorneys for Defendant East 93 Holdings LLC ("Defendant"). This letter is respectfully submitted to request an extension of time for Defendant to serve its answer pursuant to Fed. R. Civ. P. Rule 12(a)(1)(A).

Upon information and belief, Defendant was served via Secretary of State pursuant to New York Limited Liability Law § 303 on July 26, 2017. Accordingly, pursuant to Fed. R. Civ. P. Rule 12(a)(1)(A), Defendant's time to answer expires on August 16, 2017. In light of the approaching deadline, Defendant hereby respectfully requests a 30-day extension of time to serve its answer to afford the undersigned's office additional time to review this matter prior to serving and filing an Answer in compliance with Fed R. Civ. P. Rules 8 and 11.

This is Defendant's first request for an extension of time to Answer. My associate has reached out to Alan Smikun, Esq., of The Margolin & Weinreb Law Group, LLP, attorneys for Plaintiff, who has consented to Defendant's request for an extension of time provided that Defendant waive defenses premised upon personal jurisdiction.

Accordingly, Defendant respectfully submits that Your Honor so order an extension of time for Defendant to Answer to September 15, 2017.

Respectfully Submitted,

BERG & DAVID, PLLC

/ s / David Berg

David Berg, Esq.
Attorneys for Defendant
266 Broadway, Suite 503
Brooklyn, N.Y. 11211

cc: Counsel of record via ECF